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13. ABSTRACT (Maximum 200 words) IN ACCORDANCE WITH A DIRECTIVE FROM THE COLORADO DEPARTMENT OF HEALTH, THE REINJECTION WATER AT THE NORTH BOUNDARY OF RMA WILL BE SUBJECT TO DRINKING WATER STANDARDS AS ESTABLISHED BY THE U.S. EPA AND THE CDH. IN ADDITION TO ORGANIC LIMITATIONS FOR WHICH PURPOSE THE GRANULAR ACTIVATED CARBON SYSTEM WAS INSTALLED, THERE IS ALSO A SPECIFIC LIMIT OF 2.4 MG/L OF FLUORIDE. THE PURPOSE OF THIS STUDY WAS TO DETERMINE THE TECHNO-ECONOMIC FEASIBILITY OF THE ACTIVATED ALUMINA PROCESS TO REMOVE EXCESS FLUORIDE FROM THE CARBON TREATED WATER. THE STUDY INCLUDED DATA ON PH AND FLUORIDE LEVELS OF THE RAW AND TREATED WATER THROUGH TWO EXHAUSTION CYCLES OF THE ALUMINA AND TWO CHEMICAL REGENERATION CYCLES. PRELIMINARY CHEMICAL USAGE, OPERATING AND CAPITAL COSTS ARE PRESENTED ALONG WITH THE TEST ANALYTICAL RESULTS.					
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FEASIBILITY STUDY
FOR THE
REMOVAL OF EXCESS FLUORIDE
FROM
ACTIVATED CARBON EFFLUENT
FOR

THE DEPARTMENT OF THE ARMY
ROCKY MOUNTAIN ARSENAL
(REF. #DAAA05-78-M-0914)

BY

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September 30, 1978

Project Authorization:

Project Manager for Chemical Demilitarization
and Installation Restoration
Aberdeen Proving Ground, MD
ITARMS Project No. 1.05.15

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FEASIBILITY STUDY FOR THE REMOVAL
OF EXCESS FLUORIDE FROM ACTIVATED
CARBON EFFLUENT

I. Introduction

In accordance with a directive from the Colorado Department of Health, the reinjection water at the north boundary of the Rocky Mountain Arsenal will be subject to drinking water standards as established by the U. S. Environmental Protection Agency and the Colorado Department of Health (see Appendix H). In addition to organic limitations for which purpose the granular activated carbon system was installed, there is also a specific limit of 2.4 mg/l of fluoride. This directive is consistent with similar actions presently underway in many states including Arizona, California, Texas relating to fluoride in potable ground water supplies. The purpose of this study was to determine the techno-economic feasibility of the activated alumina process to remove excess fluoride from the carbon treated water. The study included data on pH and fluoride levels of the raw and treated water through two (2) exhaustion cycles of the alumina and two chemical regeneration cycles.

Preliminary chemical usage, operating and capital costs are presented along with the test analytical results.

II. Test Description

A. General Procedures.

The test apparatus schematically shown in Appendix F was installed on September 11, 1978 adjacent to the activated carbon system in the north boundary treatment building and was operated through September 23, 1978.

The test apparatus included a ten-inch diameter by five foot high PVC column containing one cubic foot of activated alumina (Alcoa F-1, 28 x 48 mesh).

During each run the pH of the carbon treated water was adjusted downward by the addition of H_2SO_4 and the water then passed downflow through the alumina at a flow rate between 1.5 and 1.6 gpm. Samples of the pH adjusted raw water and treated water were periodically examined for fluoride and pH levels.

Comparative analyses between on-site fluoride tests and RMA analytical laboratories indicated a very close correlation throughout the study (see Appendix G).

Samples of the regeneration effluent were collected in 50 and 100 gallon composites and the concentration of the fluoride determined.

B. Discussion.

Removal of fluoride from the carbon treated water by the activated alumina process proceeded as expected during the first run achieving levels of 0.25 mg/l for part of the run. In all 13,320 gallons were treated with an
with 42 million gallons/year \therefore 3156 cycles/FT³

average fluoride level of 1.04 mg/l (Appendix A). This represents an alumina capacity of 2,781 grains per cubic foot.

Regeneration of the alumina following the first run proceeded normally but the pH of the effluent solution did not achieve expected levels of 12+. Analysis of the composite sample regeneration fluids indicated incomplete removal of fluoride from the bed. Therefore, a second regeneration was performed. Data (Appendix C) indicates that 2,400 grains of fluoride were recovered from both regenerations. This represents 85% of the total fluoride removed during the first run. In the second run as in the first, fluoride levels reached the 0.25 mg/l level for a portion of the run and 11,325 gallons were treated with an average fluoride concentration of 1.00 mg/l. This represents a capacity of 2,440 grains of fluoride per cubic foot of alumina.

The second regeneration of the alumina proceeded normally. Data on the composite sample of regenerate solution indicated a total recovery of 1,880 grains of fluoride. Again as in the first regeneration, this represents incomplete (79%) recovery of the fluoride from the bed.

An additional regeneration test was performed on the alumina bed which had undergone the aforementioned two exhaustion and two regeneration cycles. One tenth (1/10) of a cubic foot of alumina was placed in a two-inch column

and treated with 1.5% NaOH in the same manner as the on-site study. Approximately, fifty-three grains of fluoride was removed which would equate to 530 grains in the one cubic foot test bed of alumina. Since 1,880 grains had previously been extracted, the total recovery extrapolates to 2,410. This compares reasonably well to the total fluoride removed during the second exhaustion cycle of 2,440 grains per cubic foot.

While outside the scope of this study, tests for other chemical constituents such as boron and total organic carbon (TOC) indicate some variability in the quality of the water being treated. The drop in fluoride removal capacity of the alumina (2,781 to 2,440 grains per cubic foot) between Run I and II suggest the presence of chemical constituents which compete with fluoride for alumina sites.

III. Preliminary Process Design

The following parameters were used to outline a proposed full-scale treatment facility:

1. Location: Northeast corner of the carbon treatment building at north boundary. Treatment units inside - chemical storage outside.
2. Pumping: Provided by carbon system.
3. Backwashing: Taken from effluent of on-stream carbon treatment units.

4. Utilities: Electrical - within building.
 Air - within building.
 Water - carbon treated effluent.
5. Operator: Available from present staff.
6. Chemical
 Delivery: From bulk trucks.
7. Flow Rate: 80 - 200 gpm.
8. Wastewater
 Handling: Evaporation pond.
9. Instrumentation: Flow regulator and totalizer, pH
 controller and indicator.

The treatment units would consist of four (4) adsorbers containing 140 cubic feet of activated alumina with appropriate underdrain piping and head room to allow periodic backwashing. A day tank will feed acid in proportion to the flow and in response to pH controllers. The acidified water will be processed downflow in three of the four tanks. The fourth unit will be in reserve each cycle.

Acid and caustic storage tanks located outside and adjacent to the alumina process equipment will supply chemicals to the day tanks. Caustic regeneration of the alumina will occur for the first of the treatment vessels when the blended effluent approaches the treatment objective of 1 mg/l. Each alumina bed will be placed in service on a staggered startup basis to effect sequential exhaustion of each of the four treatment beds. This allows blending of effluents for greater economy.

Regenerate fluids including rinse waters will be diverted to a lined evaporation pond adjacent to the treatment building.

The existing carbon plant operations personnel will be required to monitor performance, fill the day tanks, take samples, and to perform regeneration procedures.

IV. Capital and Operating Cost Projections

A. Capital Costs.

<u>Process Equipment</u>		\$60,000.00
Treatment vessels	\$15,000.00	
Process piping and instrumentation	15,000.00	
Activated alumina	8,000.00	
Chemical storage vessels	15,000.00	
Chemical pumps, piping and accessories	7,000.00	
<u>Process Equipment Installation</u>		32,000.00
<u>Lined Evaporation Pond</u>		<u>50,000.00</u> ✓
Subtotal		\$142,000.00
<u>Contingency and Contractors Profit</u>		20,000.00
<u>Engineering</u>		25,000.00
Services	20,000.00	
Expenses	5,000.00	
TOTAL		<u>\$187,000.00</u>

*Based upon September 1978 prices

B. Operating Costs.

The chemical costs developed during the study are summarized in Appendix E. These data are based upon an average capacity of 2,600 grains per cubic foot of alumina for removal of 5.0 to 4.0 mg/l of fluoride to a 1 mg/l average level. The projected acid consumption can be extrapolated from the test results (Appendix E) with reasonable certainty. On the other hand, caustic consumption during the test was not firmly established. Higher than normal amounts of regenerate was used in the first cycle regeneration. Additionally, the second cycle exhausted alumina did not release all of the fluoride removed in the second cycle. Until additional testing develops more precise data, it is necessary to project higher than normal caustic costs. Therefore, the projected costs which follow assume the caustic requirements to be that used during the test. Additionally, the working capacity is projected at 2,000 grains per cubic foot which is only 75% obtained during the study.

Using these parameters the operating costs can be projected as follows:

	\$ per 1,000 <u>Gallons</u>
1. Chemicals	
66 Be H_2SO_4 @ \$60/Ton	\$0.056
50% NaOH \$205/Ton	0.136
2. Alumina Replacement	
3% per year @ 40¢ pound	0.010

@ 20% loss of efficiency each cycle
 $\frac{3156 \text{ cycles/FT}^3}{140} = 22 \text{ cycles}$ $\therefore 5 \text{ replacements}$
Page 7

3. Operator (existing)	--
4. Electricity (existing)	--
5. Miscellaneous Supplies/Service	<u>0.02</u>
	\$.212

The high caustic regeneration projected costs results from a higher price for caustic in truck deliveries vs. rail (205/Ton vs. \$179/Ton) and inefficient caustic regeneration during the test. Further study should develop more effective regeneration procedure and thus reduce operating costs.

V. Conclusions and Recommendations

Using the activated alumina process, this study demonstrated that excess fluoride can be removed from the carbon treated water at the reinjection site of the northern boundary of the Rocky Mountain Arsenal. This study consisting of two complete treatment cycles including chemical regeneration demonstrated the removal of fluoride from levels of 4-5 mg/l to an average 1 mg/l or less. Additionally, a capacity of more than 2,000 grains of fluoride per cubic foot of alumina was achieved. This fluoride removal performance is better than the specific limitations cited by the EPA and the Colorado Department of Health of 2.4 mg/l.

A full-scale treatment plant rated for 80-200 gallons per minute is projected to cost \$187,000.00 for engineering design, installation and start-up. Operating costs are pro-

jected to be 21 cents per 1,000 gallons utilizing the existing personnel and available pumping. Improved operating costs are likely to be developed if additional cyclic tests are performed to optimize caustic regeneration.

A lined evaporation pond was included in the capital cost projections since this method of wastewater handling has been used successfully in Arizona projects. There are other methods of disposal which can be considered if evaporation ponds are inappropriate at this site. *what*

It is recommended that the Rocky Mountain Arsenal proceed with the design and installation of a full-scale fluoride system in order to comply with Colorado Department of Health directives.

Concurrent to the engineering design effort, a laboratory study is recommended to analyze the retained samples from this study of raw and treated water along with regenerate fluid to determine if any other chemical constituents (in addition to fluoride) are being retained on the alumina and/or released during regeneration.

Based on these analyses additional alumina exhaustion and regeneration cycles should then be performed to optimize the caustic regeneration procedure for maximum long term economy.

LIST OF APPENDICES

Appendix A	Test Run No. 1 Data Tabulation
Appendix B	Test Run No. 2 Data Tabulation
Appendix C	Regeneration of Activated Alumina Following Test Run No. 1
Appendix D	Regeneration of Activated Alumina Following Test Run No. 2
Appendix E	Chemical Consumption Data - Feasibility Study
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Appendix H	Letter from Colorado Department of Health
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Appendix I-B	Analysis of 30 Gallon Barrel Rocky Mountain Arsenal Carbon Treatment Effluent

APPENDIX A

TEST RUN NO. 1 DATA TABULATION

Time (hrs:min)	<u>Δ</u> Gals Treated	Total Gals Treated	Adj RW pH	TW pH	RW F mg/l	TW F mg/l	<u>Δ</u> Ave F mg/l	<u>Δ</u> Grains Removed	Total Grains Removed	TW Ave F mg/l
0:00	0	0	5.0	10+	4.1	0.95	0.95	9	9	0.95
0:30	50	50	5.0	8.2	4.1	0.70	0.87	10	19	0.91
1:00	50	100	5.0	7.8		0.68	0.69	8	27	0.84
1:30	40	140	5.0	7.6		0.66	0.67	12	39	0.79
2:15	60	200	5.5	7.5		0.61	0.63	10	49	0.76
2:45	50	250	5.5	7.5		0.25	0.43	86	135	0.55
7:15	400	650	5.5	6.5		0.25	0.25	138	273	0.41
14:15	610	1260	5.5	5.9		0.25	0.25	82	355	0.37
18:15	360	1620	5.5	5.8		0.25	0.25	20	375	0.37
19:15	90	1710	5.5	5.8		0.25	0.25	61	436	0.35
22:15	270	1980	5.5	5.7		0.30	0.27	41	477	0.34
24:45	180	2160	5.5	5.7		0.30	0.30	103	580	0.34
28:45	390	2550	5.5	5.6	4.8	0.25	0.28	94	674	0.33
32:45	390	2940	5.5	5.6		0.25	0.25	163	837	0.32
38:45	610	3550	5.5	5.5		0.25	0.25	89	926	0.31
42:15	350	3900	5.5	5.5	4.6	0.30	0.28	48	974	0.31
44:15	190	4090	5.5	5.5		0.30	0.30	91	1065	0.31
47:45	360	4450	5.5	5.5		0.30	0.30	89	1154	0.31
51:15	350	4800	5.5	5.5		0.35	0.32	128	1282	0.31
56:15	510	5310	5.5	5.5	5.0	0.50	0.43	175	1457	0.32
62:45	650	5960	5.5	5.5	4.9	0.70	0.60	111	1568	0.34
67:15	440	6400	5.5	5.5		0.72	0.71	49	1617	0.35
69:15	200	6600	5.5	5.5	4.8	0.82	0.77	71	1688	0.37
72:15	300	6900	5.5	5.5		0.85	0.83	23	1711	0.38
73:15	100	7000	5.5	5.5		0.88	0.86	69	1780	0.40
76:15	300	7300	5.5	5.5	5.0	0.93	0.91	48	1828	0.41
78:15	200	7500	5.5	5.5		0.98	0.95	69	1897	0.43
81:15	290	7790	5.5	5.5						

APPENDIX A

TEST RUN NO. 1 DATA TABULATION

Time (hrs:min)	<u>Δ</u> Gals Treated	Total Gals Treated	Adj RW pH	TW pH	RW F mg/l	TW F mg/l	<u>Δ</u> Ave F mg/l	<u>Δ</u> Grains Removed	Total Grains Removed	TW Ave F mg/l
87:00	600	8390	5.5	5.5	4.6	1.15	1.05	125	2022	0.47
91:45	458	8848	5.5	5.5	4.6	1.35	1.25	90	2112	0.51
95:45	422	9270	5.5	5.5	4.75	1.55	1.45	82	2194	0.56
97:15	140	9410	5.5	5.5		1.80	1.67	25	2219	0.57
98:45	560	9970	5.5	5.5		1.90	1.85	96	2315	0.64
102:45	800	10770	5.5	5.5	4.90	1.95	1.92	140	2455	0.74
114:45	200	10970	5.5	5.5		2.10	1.04	45	2500	0.75
119:45	510	11480	5.5	5.5		2.20	2.15	83	2583	0.81
123:45	390	11870	5.5	5.5	4.70	2.50	2.35	54	2637	0.86
129:15	900	12770	5.5	5.5		2.80	2.65	93	2730	0.98
135:15	460	13230	5.5	5.5		2.80	2.80	51	2781	1.04

APPENDIX B

TEST RUN NO. 2 DATA TABULATION

Time (hrs:min)	Δ Gals Treated	Total Gals Treated	Adj RW pH	TW pH	RW F mg/l	TW F mg/l	Δ Ave F mg/l	Δ Grains Removed	Total Grains Removed	TW Ave F mg/l
0:00				11.8	4.7	5.0	3.6	1	1	3.60
0:15	20	20	3.0	11.4		2.2	1.8	8	9	2.3
0:30	45	65		11.2		1.5	1.0	10	19	1.6
1:00	47	112	3.0	10.8		0.58	0.42	104	123	0.67
5:15	413	525	4.5	6.4		0.25	0.25	35	158	0.59
6:45	133	658	5.5	5.6		0.25	0.25	146	304	0.43
11:15	559	1217	5.5	5.6		0.25	0.25	26	330	0.42
12:15	101	1318	5.5	5.6		0.25	0.25	13	343	0.41
12:45	50	1368	5.5	5.6	4.7	0.25	0.25	106	449	0.37
16:45	405	1773	5.5	5.5		0.25	0.25	127	576	0.35
21:30	487	2260	5.5	5.5		0.25	0.25	202	778	0.32
29:00	770	3030	5.5	5.5		0.25	0.25	137	915	0.31
33:15	525	3555	5.5	5.5	4.7	0.25	0.25	106	1021	0.30
37:15	405	3960	5.5	5.5		0.30	0.27	103	1124	0.30
41:15	395	4355	5.5	5.5		0.35	0.33	80	1204	0.30
45:15	312	4667	5.5	5.5		0.60	0.47	230	1434	0.33
54:15	923	5590	5.5	5.5	4.7	0.75	0.67	93	1527	0.35
59:15	400	5990	5.5	5.5		0.90	0.82	114	1641	0.39
64:15	500	6490	5.5	5.5		1.00	0.95	110	1751	0.43
68:15	500	6990	5.5	5.5		1.40	1.20	81	1832	0.47
72:15	395	7385	5.5	5.5		1.60	1.50	100	1932	0.52
77:45	405	7790	5.5	5.5		1.70	1.65	47	1978	0.56
79:45	260	8050	5.5	5.5		1.80	1.75	61	2040	0.61
83:15	350	8400	5.5	5.5		1.90	1.85	67	2107	0.67
87:15	400	8800	5.5	5.5						

APPENDIX B

TEST RUN NO. 2 DATA TABULATION

Time (hrs:min)	<u>Δ</u> Gals Treated	Total Gals Treated	Adj RW pH	TW pH	RW F mg/l	TW F mg/l	<u>Δ</u> Ave F mg/l	<u>Δ</u> Grains Removed	Total Grains Removed	TW Ave F mg/l
90:15	290	9090	5.5	5.5		2.0	1.95	47	2154	0.70
94:15	300	9390	5.5	5.5		2.2	2.10	46	2200	0.75
102:45	710	10100	5.5	5.5		2.3	2.25	102	2224	0.86
104:15	170	10270	5.5	5.5		2.3	2.3	24	2248	0.88
107:15	260	10530	5.5	5.5		2.3	2.3	37	2285	0.91
111:15	375	10905	5.5	5.5		2.3	2.3	53	2338	0.96
115:00	375	11325	5.5	5.5		2.4	2.35	51	2440	1.00

APPENDIX C

REGENERATION OF ACTIVATED ALUMINA

FOLLOWING TEST RUN NO. 1

Time (hrs:min)	Total Gals Caustic	Total Gals Rinse	gpm ft ²	TW pH	Δ Gr F	
0:00			4.8			Start rinse
0:20		52				Stop rinse - drain tank
1:00	17a)		1.1			Start regeneration solution upflow
1:28						Stop regeneration solution
1:42			2.8			Start rinse - collect in 55 gallon barrel
1:45				11.4		Too low!
1:55				11.2		
2:03				10.6		
2:15		55		9.6	734	First barrel full F = 240 mg/l
						Start second barrel
2:25				9.2		Increased flow
2:35			4.6	9.0		Second barrel full F = 90 ppm - stop rinse
2:45		55		8.6	291	Start regeneration solution downflow
3:05			1.1			Stop regeneration solution
3:33	17b)			11.6		Start downflow rinse
4:31			2.8			Stop rinse
7:15		200		9.2		Composite 100 gallons F = 115 mg/l
					676	Composite 100 gallons F = 11 mg/l
					64	Insufficient F recovery - start regeneration
7:20			1.1			Start additional downflow regeneration solution
7:48	17c)			11.5		Start rinse
7:50			0.9			Composite 125 gallons F = 110 mg/l
8:18	10d)			12+		
10:03		98			808	
						Total F Recovery = 2573 gr

- a) 900 ml of 50% NaOH in 17 gallons of water
- b) 1100 ml of 50% NaOH in 17 gallons of water
- c) 1100 ml of 50% NaOH in 17 gallons of water
- d) 1100 ml of 50% NaOH in 10 gallons of water

APPENDIX D

REGENERATION OF ACTIVATED ALUMINA

FOLLOWING TEST RUN NO. 2

Time (hrs:min)	Total Gals Caustic	Total Gals Rinse	gpm ft ²	TW pH	Δ Gr F	
0:00						Drain tank
0:20			1.1			Start upflow regeneration solution
0:50	20 ^{a)}		3.7			Stop regeneration solution - start rinse and collect in 55 gallon barrel
0:57				7.5		
1:00				12+		
1:13				12		
1:25		55		11.6	1219	Barrel full F - 375 mg/l
1:40				11.5		
1:53					244	Second barrel full F = 112 mg/l - stop upflow rinse
2:15			1.1			Start downflow regeneration solution
2:30	20 ^{b)}					Stop regeneration solution - start downflow rinse
3:30				11.4		Increase flow
3:50				10.8		
4:05		200		10.6		Stop rinse
					382	Composite 100 gallons rinse F = 65 mg/l
					35	Composite 100 gallons rinse F = 6 mg/l

Total F Recovery = 1880 gr

- a) 1550 ml of 50% NaOH in 20 gallons of water
- b) 1550 ml of 50% NaOH in 20 gallons of water

APPENDIX E

CHEMICAL CONSUMPTION DATA - FEASIBILITY STUDY

Acid

Run No. 1	4,700 ml 66° Be H ₂ SO ₄	for 13,230 gallons of treated water
Run No. 2	<u>4,000 ml</u>	for <u>11,325</u> gallons of treated water
	8,700	24,555
	2,298 gallons per 24,555 gallons of treated water	
	0.092 gallons per/1,000 gallons of treated water	
	1.38 gallons per/1,000 gallons of treated water	
@ \$60/Ton	= 0.041 cents per/1,000 gallons of treated water	

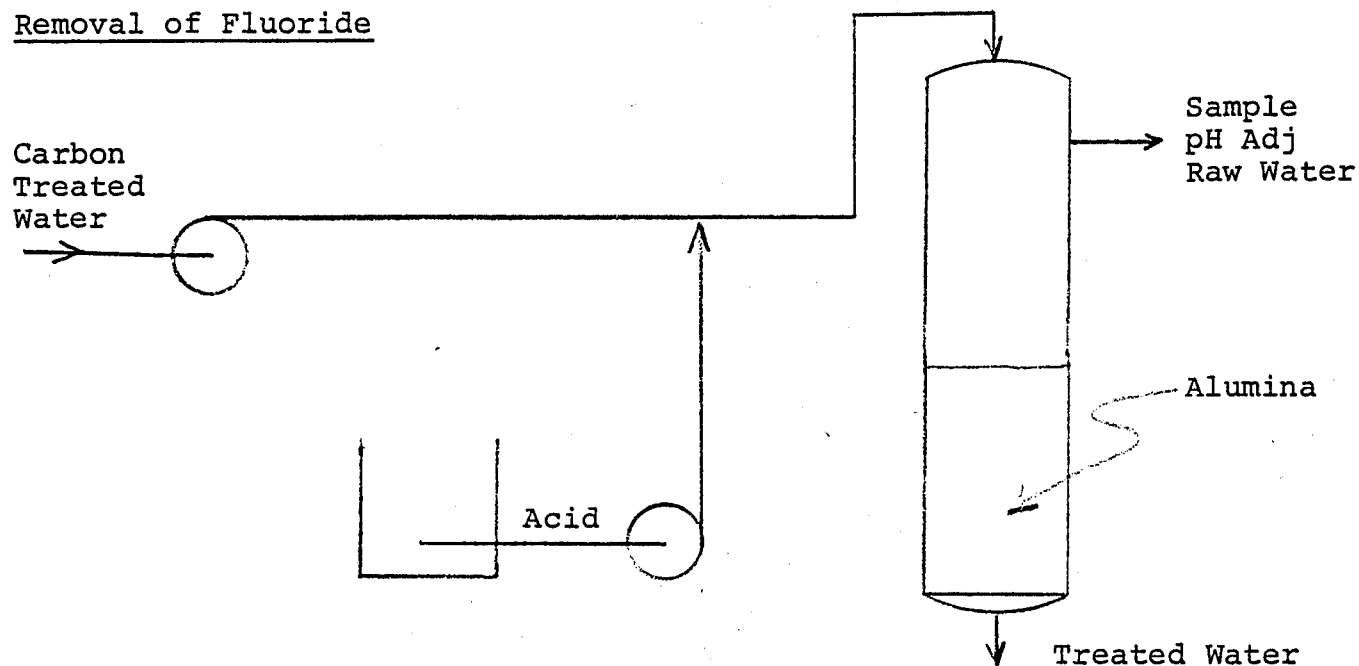
Caustic

Regeneration	
No. 1	4,200 ml 50% NaOH
No. 2	<u>3,100 ml</u> 50% NaOH
	7,300 per 24,555 gallons of treated water
	1929. gallons per 24,500 gallons of treated water
	0.077 gallons per/1,000 gallons of treated water
	0.98 pounds per/1,000 gallons of treated water
@ \$205/Ton	= 0.10 cents per/1,000 ggalons of treated water

APPENDIX F

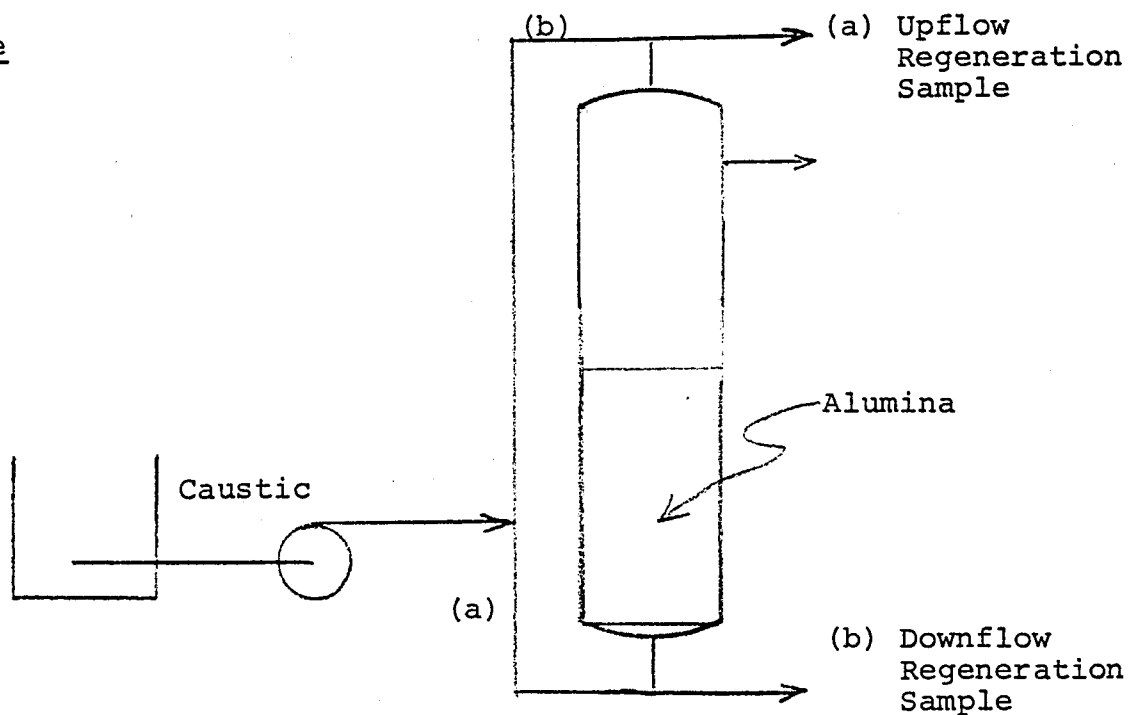
TEST APPARATUS SCHEMATIC

Removal of Fluoride



Regeneration Cycle

- (a) Upflow
- (b) Downflow



APPENDIX G

FLOURIDE ANALYSES COMPARISONS

Sample No.	Gallons Treated	On Site Analysis*	RMA Specific ion mg/l	RMA Technicon mg/l
<u>Run No. 1</u>				
1	140	0.68	0.15	less than 0.20
2	650	0.25	less than 0.10	less than 0.20
3	1,260	0.25	less than 0.10	less than 0.20
4	3,550	0.25	less than 0.10	less than 0.20
5	5,310	0.35	0.12	less than 0.20
6	5,960	0.50	0.46	0.50
7	6,900	0.82	0.56	0.59
8	8,390	1.15	1.10	1.17
9	9,270	1.55	1.40	1.49
10	9,970	1.90	1.64	1.71
11	10,970	2.10	2.00	2.04
12	11,870	2.50	2.16	2.24
13	13,230	2.80	2.69	2.87

Run No. 2

1	320		1.58	1.64
2	830	0.25	0.35	0.34
3	2,063	0.25	less than 0.10	less than 0.20
4	3,030	0.25	less than 0.10	less than 0.20
5	4,667	0.35	0.18	0.20
6	5,590	0.60	0.60	0.62
7	6,490	0.90	1.21	1.14
8	8,800	1.90	2.10	1.91
9	10,100	2.30	2.20	2.16

* Hach DR 2 Spectrophotometer



APPENDIX H

COLORADO DEPARTMENT OF HEALTH

4210 EAST 11TH AVENUE • DENVER, COLORADO 80220 • PHONE 388-6111

Anthony Robbins, M.D., M.P.A. Executive Director

May 27, 1977

Colonel Byrne
Commanding Officer
Rocky Mountain Arsenal
Denver, Colorado 80240

Colonel Byrne:

Several times in the past, Arsenal personnel have requested guidance on the quality of the reinjection water at the north boundary of the Rocky Mountain Arsenal.

After consideration of water use in the area north of the Rocky Mountain Arsenal, it was concluded that the quality of the reinjected water should be subject to drinking water standards. State drinking water limitations are contained in part 5 of "Standards for the Quality of Water Supplied to the Public", a copy of which is attached. The fluoride level contained in this part is incorrect and should be 2.4 mg/l as directed by Section 141.11(c) of the December 24, 1975 federal register entitled "Water Programs". In addition, Section 141.12 addresses levels for organic chemicals which should be met.

The Colorado Department of Health has reviewed the findings of the National Academy of Science relative to temporary guidelines for DIMP and DCPD in drinking waters. Based on toxicity, this Department is in agreement with the 0.3 ppm DIMP and 1.28 ppm DCPD limits. However, due to odors associated with DCPD, the reinjected water will be subject to the threshold odor number of 3, directed by part 4 of the State regulations.

If there are any questions, please contact this Department.

Very truly yours,

Robert D. Siek
Assistant Director, Department of Health
Environmental Health

RDS:RJS/emf

APPENDIX I-A

LABORATORY EVALUATION 30 GALLON BARREL

(.01 ft³ alumina 28 x 48 mesh)

Time	Adjusted RW pH	RW F mg/l	TW F mg/l	TW pH	
8/9/78					Start downflow 40 Ml per minute
11:00 a.m.	7.8	3.9			
11:30 a.m.			1.1	8.9	
1:30 p.m.	4.0		0.6	8.5	Adjust acid feed
2:30 p.m.	5.5		0.4	8.2	Adjust acid feed
4:30 p.m.			0.35	8.0	
7:00 p.m.			0.35	7.7	
9:00 p.m.			0.30	7.6	Flow off
8/10/78					Flow on 40 Ml per minute
9:00 a.m.		3.9			
9:15 a.m.	4.0		0.45	7.8	Adjust acid feed
11:00 a.m.			0.4	7.2	
1:00 p.m.			0.3	6.8	
3:00 p.m.			0.25	6.8	Sample depleted

CONCLUSION: The process functions normally on this water and on-site cyclic test are recommended to verify alumina capacity for fluoride removal.

APPENDIX I-B

ANALYSIS OF 30 GALLON BARREL

ROCKY MOUNTAIN ARSENAL CARBON TREATMENT EFFLUENT

Dissolved Solids @ 180°C mg/l	1500
Nitrate Nitrogen as N	less than 0.05
Total Phosphate as P	2.8
Boron	0.5
Fluoride	3.5
Hardness as CaCO ₃	480
Arsenic	less than 0.01
Barium	less than 0.1
Cobalt	0.05
Manganese	0.80
Selenium	0.012
Zinc	0.30
Total Organic Carbon	15